

Three Rivers District Council
Draft Local Plan
Regulation 18 Consultation 2021

Statement by Jed Griffiths MA DipTP FRTPI
On behalf of
Croxley Green Parish Council

August 2021

Introduction

1. This statement has been prepared by Jed Griffiths MA DipTP FRTPI on behalf of Croxley Green Parish Council. It has been compiled in response to a consultation by Three Rivers District Council on a draft Local Plan under Regulation 18 of the Town and Country Planning Regulations 2012.
2. The Parish Council notes that the consultation has been published in two parts. This statement focuses on Part 2 Sites for Potential Allocation. There are no detailed comments on Part 1 Preferred Policy Options, except to state that the Parish Council supports the District Council's stance on not complying with the Government's Standard Method for calculating the District's housing need figure (Question 1 of Part 1). In common with other respondents, however, the Parish Council believes that the District Council does not go far enough. Because of the Green Belt and other land use constraints in Three Rivers, a much lower figure can be justified. This has been argued forcefully in submissions by CPRE Hertfordshire and the Three Rivers Joint Residents' Association.
3. The Parish Council has given careful consideration to the sites proposed for housing allocations in Croxley Green in Part 2 of the consultation. There are particular concerns, however, about two of the proposed allocations. These are:
 - Site CG65 British Red Cross, Community Way
 - Site CFS19 Land Adjacent 62-68 and 99-121 Sycamore Road

Comments are set in the ensuing paragraphs.

Site CG 65: British Red Cross, Community Way

4. This small (0.05 hectare) site was included in Appendix 7f of the Site Assessments, dealing with Urban Capacity, and is described as previously-developed land. It is currently used as the British Red Cross building with a small ancillary car park, accessed from Community Way. The southern edge of the site adjoins the Croxley Green Public Library. To the north-west are the Barton Way allotments. There is a public right of way along Community Way adjacent to the northern boundary.
5. The assessment notes that the entire site is in the ownership of Three Rivers District Council and is deemed to be developable and achievable within the plan period. In the view of the Parish Council, there are a number of reasons against the proposal, which are outlined below.

6. First, the British Red Cross Building is a nominated Asset of Community Value (ACV). In proposing this site for development, the Council is in conflict with the National Planning Policy Framework (NPPF) 2021, which seeks to promote healthy and safe communities. Paragraph 93 of the NPPF sets out the responsibilities of the Council in planning policy, as follows:

“To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- (a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;*
- (b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;*
- (c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs;*
- (d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and*
- (e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.”*

By including this site as a proposal, the Council is not only contrary to the NPPF but also to the New Local Plan Objective 5, which seeks to support the viability, vitality and variety of shops and services within the main settlements and villages (including Croxley Green). As an ACV, the British Red Cross Building is not just an office; it has a meeting hall which provides a valuable service to the Croxley Green community. It is a part of the Croxley Green Centre, which is identified in Section 6.1 of the Croxley Green Neighbourhood Plan 2018 as a specific area for an Action Plan. The objective is to provide a “Village Centre” which is worthy of the Parish, optimising the use of the existing buildings, consolidated by Aim 17.

With its range of retail units, service and facilities, on public transport routes, the centre is in a highly sustainable location. The proposed Action Plan would work towards the improvement of the appearance and amenities of the New Road area, including more intensive use of the Red Cross Building and the improvement of Community Way. The justification for the Action Plan is clearly set out in paragraphs 6.1.1 to 6.1.3 of the Neighbourhood Plan.

7. The proposed development of the site would also be contrary to the objective for Section 5.3, Leisure, Community, Welfare and Health in the Croxley Green Neighbourhood Plan 2018. The Objective states as follows:

“Support and retain the use of the community buildings and outdoor facilities and a viable and adequate provision of health and education services within the Parish, and

Facilities such as halls, churches, schools and open spaces listed in Table LC1 are vital to the Croxley Green Parish as a community. These facilities provide the huge variety of activities in the area and the loss of any would detract from the richness of the community life. The Parish Council will support all organisations to enable them to fulfil their role in the community. The population of Croxley Green is ageing and the health services need to adapt to the changing needs and the Parish Council is committed to helping the facilities to stay within the Parish and if possible to expand their services.”

8. The British Red Cross Building is included in the list of assets in Table LC1. Three Rivers District Council has not produced any evidence to suggest that their proposal fits any of the criteria in the objective, which are amplified in paragraphs 5.3.1 and 5.3.2 of the Neighbourhood Plan. The Parish Council notes that in the final version of the Part 2 consultation document, published in June 2021, the District Council stated that “Re-provision of the community facility would be required on site.” In the draft version, considered earlier by the Council, did not include the above sentence, which appears to be a late addition. Nevertheless, the Council has not produced any evidence to demonstrate how the “re-provision” could be accomplished on this very tight area.
9. Second, the Parish Council notes that the indicative dwelling range in the Site Assessment is 5-6 units. On such a small site, it is questionable whether the number of dwellings could be accommodated on the land without building upwards – this is because of the close proximity of the site to adjacent buildings. If, as stated by the Council, a replacement community facility were to be provided, this would compound the difficulties of building on the site. In terms of Neighbourhood Plan Aim 11, it is also difficult to envisage how adequate car parking could be provided on the site itself – between six and twelve spaces would be needed for residents, let alone visitors. All the existing dwellings in New Road and Barton Road face onto the

street. As a backland development, the proposal would be incongruous and out of character with the surrounding area.

Site CFS19: Land adjacent 62-84 and 99-121 Sycamore Road

10. This site ((0.27 hectares) was brought forward as part of the Call for Sites stage of the Local Plan. It is located on the south side of Sycamore Road, which is part of a large housing estate to the south of the Watford Road. Together with Valley Walk, it lies at the end of a long cul-de-sac. The site is between houses to the west and apartments blocks to the east. It consists of mown grassland, on which there are scattered trees. The southern edge of the area has mature hedgerows, beyond which is the towing path of the Grand Union Canal. It has a very pleasant appearance.

11. Government policy, as set out in the NPPF 2021 seeks to promote healthy and safe communities, and to protect open spaces. Paragraph 99 of the NPPF states as follows:

“Existing open space, sports and recreational buildings and land, including playing fields, should not be built on, unless:

(a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or

(b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

(c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.”

12. In Part 1 of the Local Plan Consultation, at paragraph 10.40, the District Council also recognises the importance of open space recreation and sports facilities, children’s play areas and their wider benefits. This is linked to Preferred Policy Option 22, the opening part of which states:

“(1) Development proposals which result in the whole or partial loss of existing open space, sport and recreation facilities will only be permitted where:

i) The proposed development includes provision for open space, sports and recreation facilities of sufficient benefit to sport and recreation provision to offset the loss or;

ii) Alternative provision of equivalent or better quantity and quality is made for the catchment area served by the open space, sport and recreation facilities in an accessible location served by sustainable modes of transport or;

- iii) *The proposal is ancillary to an existing leisure use serving the catchment area and does not affect the open space, sport or recreation facility or:*
- iv) *A deficiency of open space, sport and recreation facilities is not created through, or exacerbated by, its loss, now or over the plan period."*

13. The Parish Council's view is that the proposed development is clearly contrary to both national and local planning policies. No assessment has been provided to show that the site is surplus to requirements. There is no suggestion that this valued area of open space can be replaced elsewhere. Aim 8 of the Neighbourhood Plan specifically seeks to safeguard recreational land.

14. In terms of its location, adjacent to the Grand Union Canal, the site is part of the Green and Blue Infrastructure network proposed in the New Local Plan Preferred Policy Option 19. The policy clearly identifies the corridor of the Grand Union Canal as an asset, to be conserved and enhanced. In this respect, the character of the area including the site is described in the Croxley Green Neighbourhood Plan Character Area 5 Watford Road (East) and Valley Walk.

15. A key objective of the Neighbourhood Plan, set out in paragraph 5.1, is to "Conserve local character by sympathetic development whatever the proposed use." This is supported by Policy CA1, which states that:

"New development should seek to conserve and, wherever possible, enhance the key elements of the character and appearance of the Character Areas described in Appendix B through careful design and massing of new buildings and the protection and enhancement of private gardens and open space without inhibiting innovative design."

16. Much of the character of the site is derived from the presence of trees and hedgerows. In part 5.9 of the Neighbourhood Plan, the objective is to:

"Conserve and enhance the character of the landscape and maintain and replace trees in the public realm, encourage private owners to replace trees which are lost and ensure that streets trees are replaced using appropriate species."

17. The objective is amplified by Aim 14 of the Plan, which is supported by paragraph 5.9.1. This refers to the strong characteristic of the suburban townscape provided by the backdrop of trees and hedges, which need continuing care. The trees on the site, are of high value in their contribution to the local and the amenity of residents and visitors.

18. Finally, the Parish Council wishes to point out that this site has a history of speculative planning applications for change of use. Details are as follows:

- 1969 W1487/69 Application for 9 flats & garages REFUSED Appeal DISMISSED
- 1993 8/163/93 Application for 12 flats in 2 blocks REFUSED Appeal DISMISSED
- 2005 05/1055.OUT Application for 8 flats REFUSED Appeal DISMISSED
- 2020 20/2737 Application for 6 flats and 3 houses REFUSED

In view of these decisions, the Parish Council finds it difficult to understand why the Council is now promoting the site for housing development in the New Local Plan.

Summary

19. In summary, the Parish Council wishes to record its strong objections to the inclusion of Sites CG65 and CFS19 for housing development in the New Local Plan. The reasons for the Parish Council's objections are set out above in this statement; both proposals are unjustified in terms of both local and national policies.

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Hertford

6th August 2021